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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

-----) MDL No. 2804
IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION)
-----) Case No. 17-md-2804
THIS DOCUMENT RELATES TO:)
ALL CASES)
-----) Hon. Dan A. Polster

HIGHLY CONFIDENTIAL
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VIDEOTAPED DEPOSITION OF
SHERRI HINKLE

January 25, 2019

Indianapolis, Indiana

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The videotaped deposition of SHERRI

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HINKLE, called by the Plaintiffs for examination,

7

taken pursuant to the Federal Rules of Civil Procedure

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of the United States District Courts pertaining to the

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taking of depositions, taken before JULIANA F.

10

ZAJICEK, a Registered Professional Reporter and a

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Certified Shorthand Reporter, at the Indianapolis

12

Marriott Downtown, Texas Room, 350 West Maryland

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Street, Indianapolis, Indiana, on January 25, 2019, at

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8:56 a.m.

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5 JOHN KNOWLES, Trial Technician

6

 THE VIDEOGRAPHER:

7

 MR. ANTHONY MICHELETTO,
8 Golkow Litigation Services

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I N D E X

WITNESS:

PAGE:

SHERRI HINKLE

EXAM BY MR. ELSNER..... 8

E X H I B I T S

EXHIBIT NUMBER

MARKED FOR ID

NO EXHIBITS MARKED.

1 THE VIDEOGRAPHER: We are now on the record. My
2 name is Anthony Micheletto. I am a videographer for
3 Golkow Litigation Services.

4 Today's date is January 25th, 2019. The
5 time is 8:56 a.m., as indicated on the video screen.

6 This video deposition is being held in
7 Indianapolis, Indiana, in the matter of In Re National
8 Prescription Opiate Litigation, for the United States
9 District Court for the Northern District of Ohio,
10 Eastern Division.

11 Our deponent is Sherri Hinkle.

12 Will counsel please identify themselves
13 for the video record.

14 MR. ELSNER: My name is Michael Elsner from
15 Motley Rice on behalf of Plaintiffs.

16 MR. GOETZ: Daniel Goetz on behalf of the
17 Plaintiffs.

18 MS. HARMON: Sarah Harmon of Armstrong &
19 Teasdale on behalf of Cardinal Health.

20 MR. CLARK: Miles Clark, Zuckerman Spaeder, on
21 behalf of CVS Indiana, LLC, CVS Rx Services, Inc. and
22 the witness.

23 MR. HYNES: Paul Hynes, Zuckerman Spaeder LLP,
24 on behalf of same parties.

1 THE VIDEOGRAPHER: Counsel on the phone?

2 MS. YAACOUB: Pamela Yaacoub from Jones Day on
3 behalf of Walmart.

4 MS. RUSSO: Shana Russo on behalf of
5 AmerisourceBergen Drug Corporation and
6 AmerisourceBergen Corporation.

7 MR. HOUSTON: Zeno Houston from Arnold & Porter
8 on behalf of the Endo and Par defendants.

9 THE VIDEOGRAPHER: Our court reporter today is
10 Juliana Zajicek.

11 Please swear in the witness.

12 (WHEREUPON, the witness was duly
13 sworn.)

14 SHERRI HINKLE,
15 called as a witness herein, having been first duly
16 sworn, was examined and testified as follows:

17 EXAMINATION

18 BY MR. ELSNER:

19 Q. Good morning.

20 A. Good morning.

21 Q. My name is Mike Elsner and I represent the
22 Plaintiffs in the case and I'm going to be asking you
23 a few questions this morning, okay?

24 A. Okay.

1 Q. If you ever need to take a break, just let
2 us know and we can go off the record and take a quick
3 break, okay?

4 A. Okay.

5 Q. Can you tell us your full name?

6 A. Sherri Lynn Hinkle.

7 Q. Okay. And where are you from?

8 A. Indianapolis, Indiana.

9 Q. Okay. Have you lived your whole life in
10 Indiana?

11 A. Yes.

12 Q. Okay. And have you ever been deposed
13 before?

14 A. No.

15 Q. Okay. Besides your attorney Mr. Hynes,
16 did you speak with anyone else about your deposition
17 today?

18 A. No.

19 Q. Okay. Did you read any depositions that
20 were taken in this case?

21 A. No.

22 Q. Okay. Can you describe for me your
23 educational background?

24 A. I went to high school at -- at Arsenal

1 Tech here in Indianapolis and I went to Indiana
2 University in Bloomington.

3 Q. All right. Did you graduate with a degree
4 from Indiana University?

5 A. Yes. A general studies degree.

6 Q. A general studies degree.

7 And when was that?

8 A. In '89.

9 Q. Okay. What was your first job after you
10 graduated from the university?

11 A. I worked at a daycare.

12 Q. Okay. How long did you do that?

13 A. Five, six years.

14 Q. All right. And what did you -- so that
15 was about, what, '89 to, what, '93, '94 or something
16 like that?

17 A. '92.

18 Q. '92, okay.

19 What did you do after that?

20 A. I went -- followed CVS.

21 Q. Okay. And in 1992, did you work for CVS
22 or did you work for Revco?

23 A. It was Hooks at the time.

24 Q. Hooks, okay.

1 A. Hooks at the time.

2 Q. And what were you doing for Hooks?

3 A. I was a picker.

4 Q. A picker. All right.

5 And did Hooks distribute controlled
6 substances?

7 A. I don't know.

8 Q. No.

9 Did Hicks [sic] distribute
10 pharmaceuticals, drugs?

11 A. I don't know.

12 Q. No.

13 So what were you --

14 MR. HYNES: I think she said "I don't know."

15 MR. ELSNER: Oh.

16 MR. HYNES: Did you say "I don't know" or did
17 you say "No"?

18 THE WITNESS: "I don't know."

19 MR. HYNES: Yeah.

20 MR. ELSNER: Oh, I'm sorry. I missed --

21 MR. HYNES: So I think she said -- I think both
22 answers were "I don't know" to those two questions.

23 BY MR. ELSNER:

24 Q. Okay. What were you picking when you were

1 working for Hooks?

2 A. When I started, I was doing makeup and
3 hair products.

4 Q. Okay. And how long did you work for
5 Hooks?

6 A. It was a year before they switched over to
7 Revco.

8 Q. To Revco, okay.

9 And then when you started at Revco, were
10 you still doing makeup, picking?

11 A. I was still picking, yes.

12 Q. Okay. And -- and the same products?

13 A. Yes.

14 Q. Okay. And how long did you work as a
15 picker at Revco?

16 A. Maybe six months before. Maybe six
17 months.

18 Q. And then it changed over to CVS?

19 A. Yes.

20 Q. Okay. And when it changed to CVS, were
21 you -- were you still working as a picker?

22 A. I -- I was working as a stocker then.

23 Q. As a stocker, okay.

24 Why did that change?

1 A. Different job position. It came with
2 regular work.

3 Q. And you applied for that?

4 A. Um-hum.

5 Q. Okay. And what were you stocking as a
6 stocker?

7 A. I was stocking in the -- in the Rx
8 department then.

9 Q. Okay. So -- so you were -- by Rx, you
10 mean pharmaceuticals or drugs?

11 A. Um-hum. The pharmaceutical, yes.

12 Q. Okay. And were those controlled
13 substances?

14 A. Yes.

15 Q. Okay. And if I'm right about this, CVS
16 purchased Revco around 1998.

17 Does that sound about right when you --

18 A. I don't remember.

19 Q. Okay. But all of this was in the same
20 building, is that right?

21 A. Yes.

22 Q. Okay. And that's the same building you
23 work today?

24 A. Yes.

1 Q. Okay. How long did you work as a stocker
2 of drugs for CVS?

3 A. Maybe about six -- maybe four, five years.
4 I don't remember.

5 Q. Okay. And when did -- and -- and then
6 what position did you take?

7 A. Inventory control.

8 Q. Okay. What is inventory control?

9 A. We keep track of all of the products in
10 the Rx department.

11 Q. Okay. So it's inventory control for
12 pharmaceuticals, is that right?

13 A. Yes.

14 Q. Are you responsible for inventory control
15 of any other products?

16 A. Because I do the cage now, controlled
17 substances now.

18 Q. Okay. I -- I'm going to just focus --
19 before we get to the cage, I want to just focus on
20 inventory.

21 Well -- well, when you started in
22 inventory control, was it in the cage or outside of
23 the cage?

24 A. When I first started, it was outside the

1 cage.

2 Q. Okay. Tell me how long you did that.

3 A. I still do it. So, almost 20 -- almost
4 15, 16 years, because I still do it now.

5 Q. You still do it now?

6 A. Um-hum.

7 Q. Okay. So when you were doing inventory
8 control for pharmaceuticals, at what -- did it include
9 controlled substances the whole time or when did you
10 start working in controlled substances?

11 A. It start that year after.

12 Q. A year after?

13 A. Um-hum.

14 Q. Okay. So what's your best estimate as to
15 the year that that -- that that happened? Is it 2000,
16 2001?

17 A. Probably 2001.

18 Q. 2001, okay.

19 And so in 2001, that's the first year you
20 started working with controlled --

21 A. Yes.

22 Q. -- substances, right?

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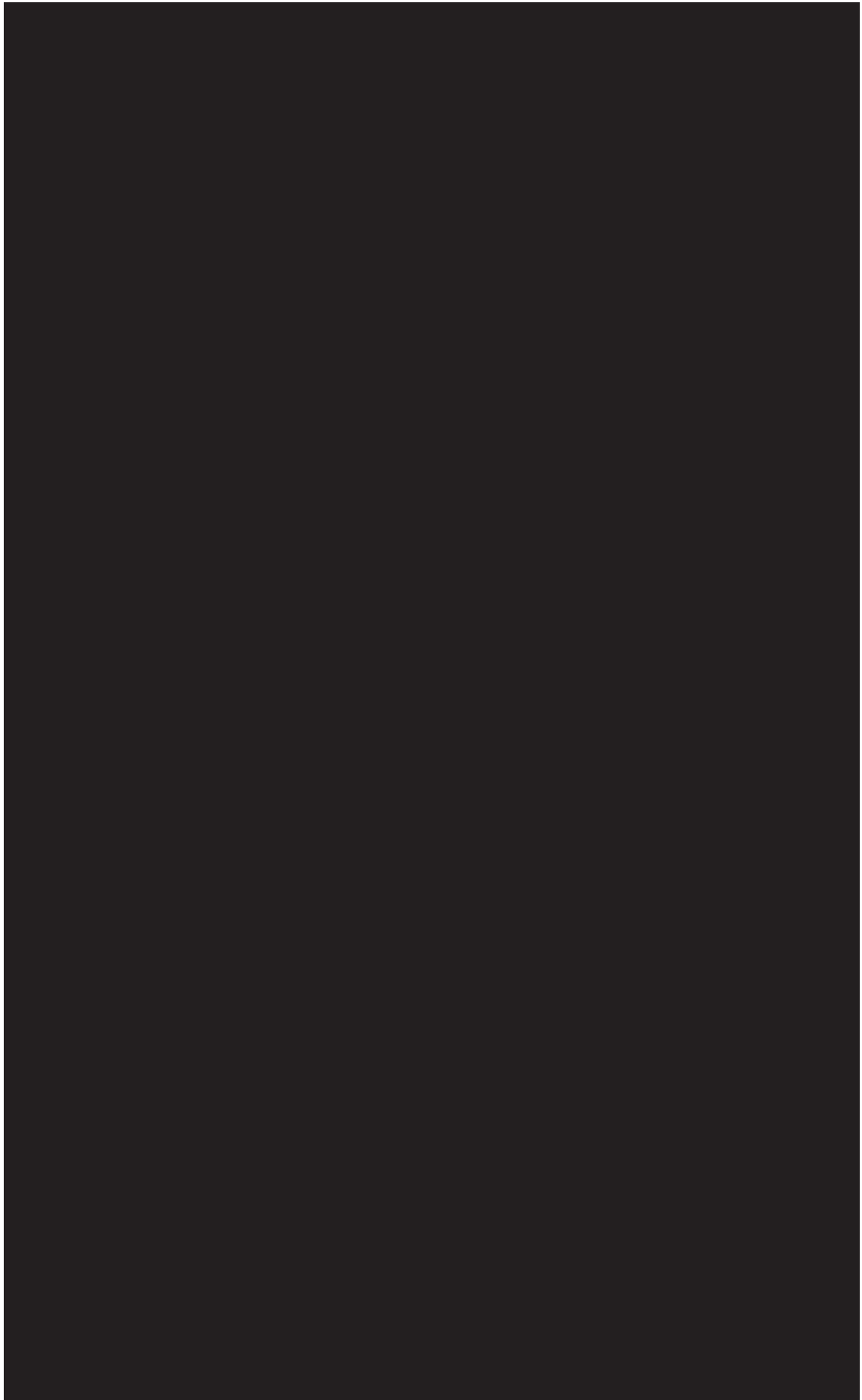
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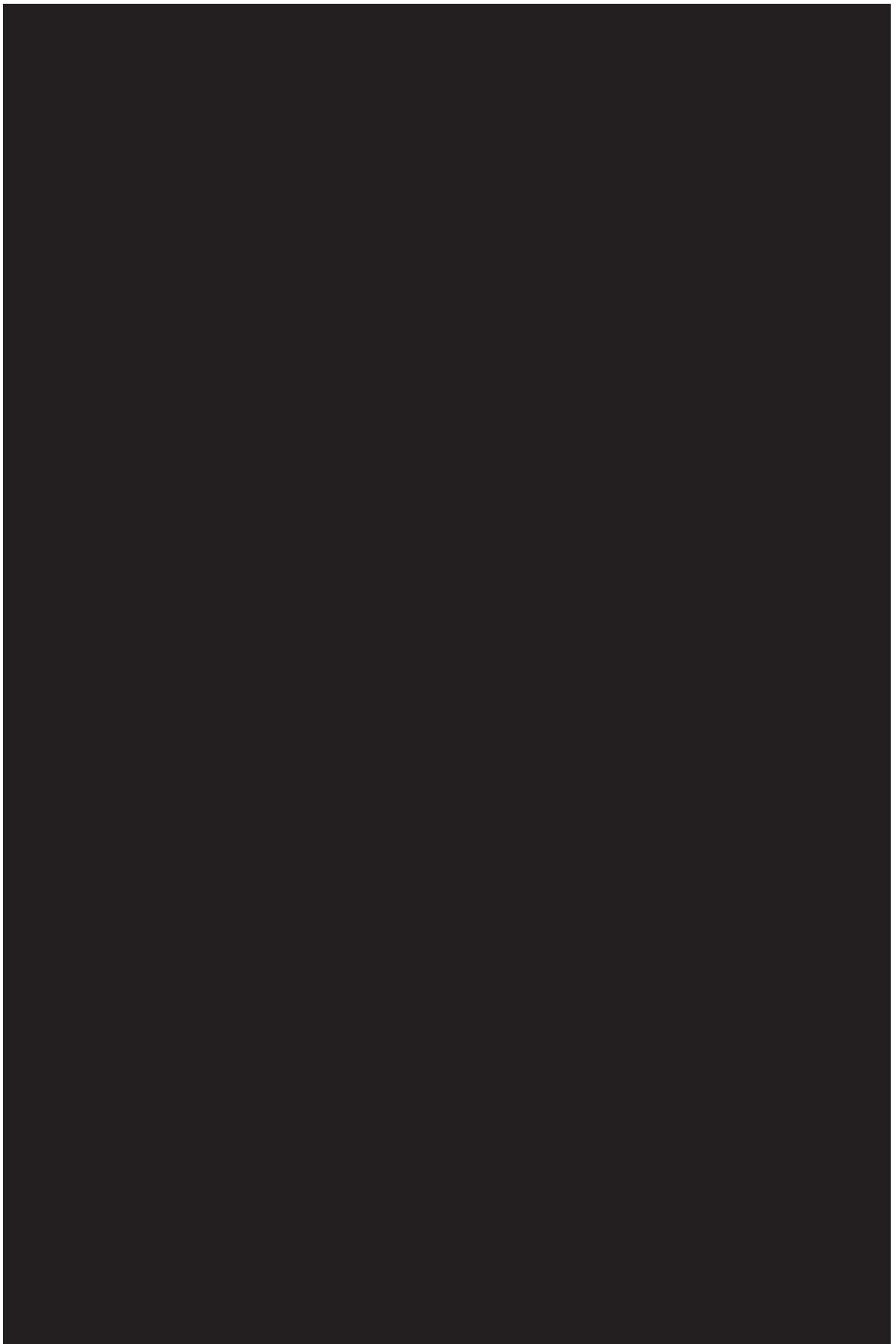
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24 Q. What time do you start that during the

1 day?

2 A. It is at the end of the day. I do my -- I
3 do it at the end of the day.

4 Q. And what time is that?

5 A. After 2:00.

6 Q. A 2:00 p.m.

7 So, are there multiple shifts of pickers?

8 A. Just one shift.

9 Q. One shift.

10 And is it during the day?

11 A. Yes.

12 Q. What time does that shift start?

13 A. 5:30.

14 Q. 5:30 a.m.

15 And that runs until what time?

16 A. 1:30.

17 Q. 1:30.

18 And what time do you come in?

19 A. 6:00.

20 Q. 6:00 a.m.

21 And how late do you work?

22 A. Two o'clock.

23 Q. 2:00 p.m.

24 A. Two o'clock or sometimes 3:00. It depends

1 how late -- how many -- late -- how late I get
2 started.

3 Q. Right, okay.

4 So -- so you come in at 6:00 and you start
5 counting the -- the -- at the time that the pickers
6 are done --

7 A. Yes.

8 Q. -- whether that's 1:30 or 1:00 or
9 whatever?

10 A. Yes.

11 Q. Sometimes it might be 2:00 p.m. And then
12 you'll -- and then you'll count until you finish?

13 A. Yes.

14 Q. And then you go home, is that right?

15 A. Yes.

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19 Q. Do you -- do you have a computer and
20 access to the internet?

21 A. Yes.

22 Q. Okay. Have you always had that?

23 A. Yes.

24 Q. In -- in control invent -- as inventory

1 control in the control room --

2 A. Yes.

3 Q. -- or control cage?

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11 Q. Okay. How big is the plant, I mean, or
12 the facility?

13 A. I -- I don't know how big it is.

14 Q. Is it -- is it bigger than your house?

15 A. Yes.

16 Q. Okay. How many -- how -- how much bigger
17 than your house?

18 A. I don't know. I can't describe it.

19 Q. Is it bigger than a football field?

20 A. I'm on the other side of the building, so
21 I'm not sure the full length of it. I --

22 Q. Okay.

23 A. -- I don't know.

24 Q. Do you do a lot of walking with your job?

1 A. Yes.

2 Q. Okay. How long does it take you to get
3 from your office, sometimes, to the product that you
4 are trying to locate?

5 A. Maybe five -- maybe five minutes depending
6 where it is.

7 Q. Okay. What I'm trying to get in terms of
8 just a general sense, it's a pretty large building,
9 correct?

10 A. Correct.

11 Q. It is not a tiny place?

12 A. No.

13 Q. And because in that building you -- CVS
14 stocks all of the products that they sell, is that
15 right?

16 A. Yes.

17 MR. HYNES: Objection to form.

18 BY MR. ELSNER:

19 Q. Everything from toilet paper to
20 toothpaste, is that right?

21 A. Yes.

22 Q. To hair products and shaving products?

23 A. Yes.

24 Q. Okay. Food, is food stocked --

1 distributed from there as well?

2 A. Certain -- some foods.

3 Q. Some foods. Snacks like pretzels and --

4 A. Yes.

5 Q. -- chips and those kinds of things?

6 A. Yes. I don't think chips, but candy.

7 Q. Candy, okay.

8 And -- and CVS sells all sorts of other
9 products, like toys and games. Is that also stocked
10 there?

11 A. Not -- no, not in our building.

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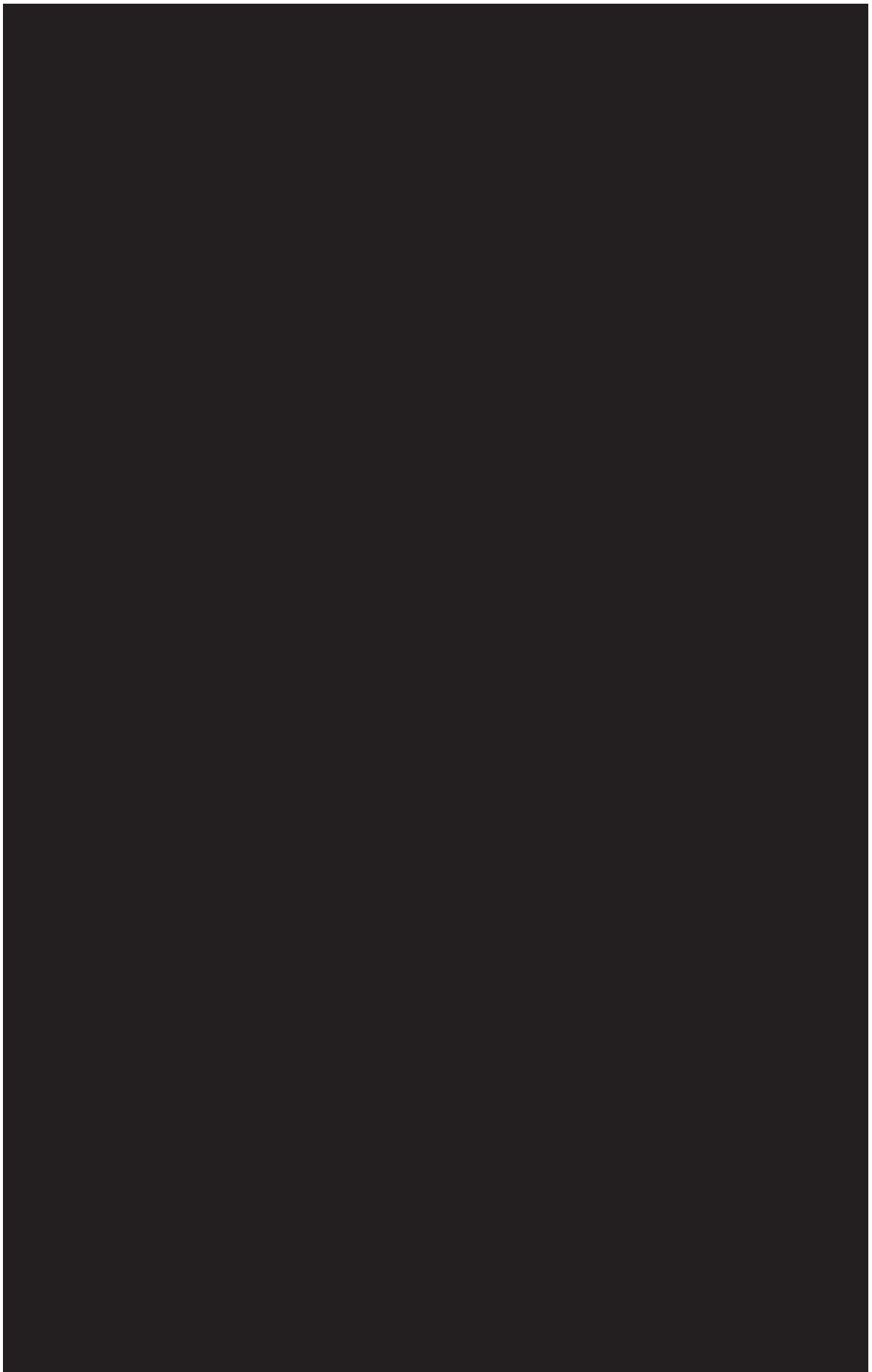
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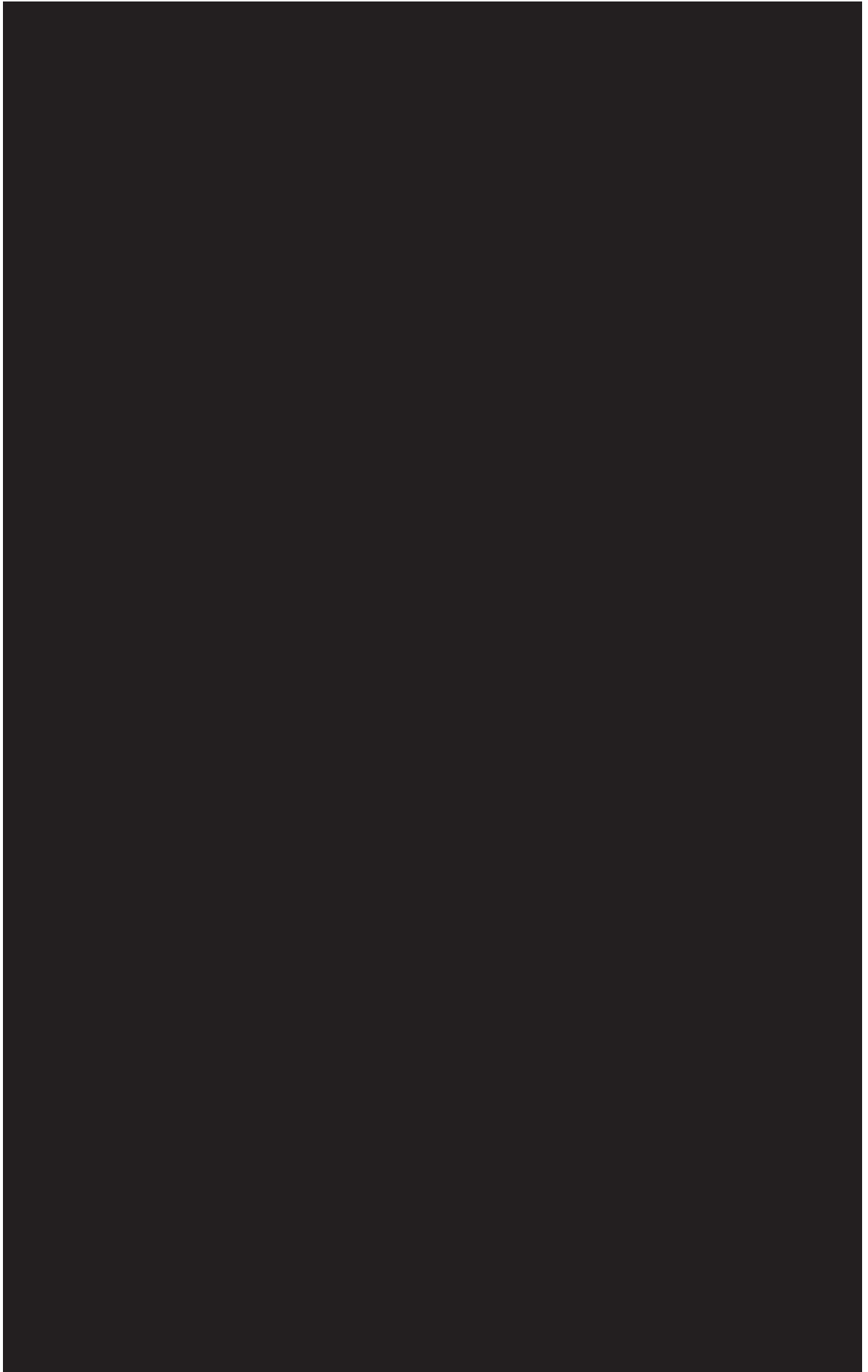
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1 A. Yes.

2 Q. Is that right? Okay.

3 Now, when that system was in place, when
4 they finished all of the picks for a particular
5 pharmacy, was then that -- was -- were those picks
6 double checked?

7 MR. HYNES: Objection to form.

8 BY THE WITNESS:

9 A. I wasn't back there in the cage at that
10 time, so I don't know.

11 BY MR. ELSNER:

12 Q. Okay. Well, what about five, six years
13 ago?

14 MR. HYNES: Objection to form.

15 BY MR. ELSNER:

16 Q. When you were in -- where you were in
17 inven control -- inventory control for controlled
18 substances?

19 A. Yes, then --

20 MR. HYNES: Objection to form.

21 BY THE WITNESS:

22 A. Yes, then they did check it.

23 BY MR. ELSNER:

24 Q. They did check it.

1 And was it -- was it again one of the
2 pickers who was working as a checker, too?

3 A. Yes.

4 Q. Okay. And how would they check it?

5 A. I don't understand the question.

6 Q. So when the picker brings the -- brings
7 the tote with all of the items that they've picked for
8 that particular pharmacy's order, when they bring that
9 to the checker, how did the checker check it?

10 Did they pull out each one and -- and --
11 and -- and check it against what?

12 A. The order.

13 Do you mean when they on -- on the light
14 system or the voice system?

15 Q. The light system. I'm sorry.

16 A. I wasn't back there when they did the
17 voice system, so I'm not for sure how they checked it
18 then.

19 Q. Did you mean you weren't back there when
20 they did the light system?

21 A. Not in -- not in the control.

22 Q. Okay. You just said "voice system," so I
23 just -- I wanted to make sure that I -- that the
24 record is clear.

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9 MR. HYNES: Objection to form.

10 BY MR. ELSNER:

11 Q. So the whole day they are spending there
12 from 5:30 in the -- the morning until about 1:30 in
13 the afternoon, I assume they get an hour lunch, is
14 that right?

15 A. Yes.

16 Q. But the rest of the time they are either
17 picking or checking.

18 Now, is there any kind of a evaluation of
19 how a picker does their job?

20 MR. HYNES: Objection to the form.

21 BY THE WITNESS:

22 A. I don't know.

23 BY MR. ELSNER:

24 Q. You don't know.

1 Do you know whether they're -- whether
2 they are -- they are rated or evaluated as to
3 accuracy?

4 MR. HYNES: Objection form.

5 BY THE WITNESS:

6 A. I don't know.

7 BY MR. ELSNER:

8 Q. Okay. Who -- who does the picker report
9 to?

10 MR. HYNES: Objection to form.

11 BY THE WITNESS:

12 A. Their supervisor.

13 BY MR. ELSNER:

14 Q. Yes. And who is that?

15 A. Right now it is Dennis Wat -- White --
16 Weaver.

17 Q. Weaver.

18 And what's Mr. Weaver's title?

19 A. Supervisor, Rx supervisor.

20 Q. Rx supervisor, is that what you said?

21 A. Um-hum.

22 Q. Okay.

23 A. Pharmacy supervisor.

24 Q. Pharmacy supervisor.

1 Who was it before Mr. Weaver?

2 A. Allen Hanson.

3 Q. How do you spell Henson, H-e --

4 A. Hanson. Hanson, H-a-n-s-o-n, I believe.

5 Q. Okay. And he also was a pharmacy
6 supervisor?

7 A. Yes.

8 Q. Okay. And before Mr. Hanson?

9 A. Dan Deaton.

10 Q. Okay. Also the pharmacy supervisor?

11 A. Yes.

12 Q. And before Mr. Deaton?

13 A. Robert Richardson.

14 Q. All right. Also the pharmacy supervisor?

15 A. Yes.

16 Q. And before Mr. Richardson?

17 A. That I don't know.

18 Q. Do you remember a -- a Gary Lamberth?

19 A. Yes.

20 Q. Was he a pharmacy supervisor?

21 A. Pharmacy manager.

22 Q. Pharmacy manager.

23 So he didn't directly manage -- he was not
24 a -- a pharmacy supervisor that would have managed the

1 pickers, correct?

2 A. Not at the -- not at the time I was up
3 there.

4 Q. Okay. Not at...

5 Now, do you remember any of the other
6 pharmacy supervisors that managed the pickers?

7 A. That's all I remember.

8 MR. ELSNER: Can we go off the record real
9 quick?

10 MR. HYNES: Yeah. Take a quick break?

11 MR. ELSNER: Sure.

12 THE VIDEOGRAPHER: We are off the record at
13 9:30 a.m.

14 (WHEREUPON, a recess was had
15 from 9:30 to 9:38 a.m.)

16 THE VIDEOGRAPHER: We are back on the record at
17 9:38 a.m.

18 BY MR. ELSNER:

19 Q. Ms. Hinkle, before we broke you were
20 giving me a list of the various people who supervised
21 the pickers in the -- in the drug control room at CVS.

22 That was not part of your responsibility,
23 is that right?

24 A. Yes.

1 Q. Yes, it was not part of your --

2 A. It was not part of my responsibility.

3 Q. Okay. And who supervised the stockers in
4 the control room?

5 A. The same supervisor.

6 Q. The same supervisor.

7 So you were not responsible for
8 supervising them either, correct?

9 A. Uhn-uhn.

10 Q. Okay. Who is your supervisor?

11 A. Jimmy Sutton.

12 Q. And what -- do you know what Jimmy
13 Sutton's title is?

14 A. Inventory control supervisor.

15 Q. Okay. Now, is he responsible for all
16 inventory control at the Indianapolis distribution
17 center?

18 A. Yes.

19 Q. So that includes everything from toilet
20 paper to control drugs?

21 A. I don't know.

22 Q. Okay. What department do you and
23 Mr. Sutton work in?

24 A. I work in the Rx department. His -- his

1 office is in the upper part of the building.

2 Q. Okay. Is he all -- so he is not in the Rx
3 department?

4 A. No.

5 Q. Okay. Do you have any -- anyone who
6 reports to you directly?

7 A. No.

8 Q. Can you name for me some of the pickers
9 who worked in the control room between 2006 and 2014?
10 Do you remember any of their names?

11 A. Deb Foster.

12 Q. Okay. Now, Deb Foster, is she still
13 working at CVS or no?

14 A. She retired.

15 Q. She retired.

16 When did she retire?

17 A. Last December.

18 Q. Okay. Anyone else?

19 A. Ellen Wilson.

20 Q. Okay. Did you say Ellen?

21 A. Ellen Wilson.

22 Q. Ellen Wilson, okay.

23 Is she still working at CVS?

24 A. Yes.

1 Q. In the same job?

2 A. A different job.

3 Q. A different job.

4 What does she do now?

5 A. She is IC clerk now, inventory control
6 clerk now.

7 Q. Inventory control clerk, okay.

8 All right. Anyone else?

9 A. Lori Huddleston.

10 Q. Is she still working at CVS?

11 A. Yes.

12 Q. What position is she in now?

13 A. She works in the control cage.

14 Q. The control cage.

15 Also as a picker?

16 A. Picker, yes.

17 Q. Okay. Anyone else?

18 A. In 2006. That's all I can remember from
19 2006.

20 Q. Now, I said 2006 through 2014, about four
21 years ago.

22 A. The people -- there are some new ones that
23 just got hired.

24 Q. Recently?

1 A. Yes.

2 Q. Okay. I'm not as interested in them.

3 When you say got -- "recent," do you mean
4 in the last year or two?

5 A. Like six months.

6 Q. Six months.

7 Is there a lot of turnover in the control
8 cage?

9 MR. HYNES: Objection to form.

10 BY THE WITNESS:

11 A. I don't know. I don't know. A lot of
12 people retires. A lot of people are retiring.

13 BY MR. ELSNER:

14 Q. A lot of people retire?

15 A. Um-hum.

16 Q. I guess what I'm trying to get at is,
17 is -- is it fair to say that of the pickers in the
18 control room, that they need to be -- we need to find
19 a new picker, you know, once a year or once every six
20 months or once every five years?

21 MR. HYNES: Objection to form.

22 BY THE WITNESS:

23 A. I don't know. I really don't.

24 BY MR. ELSNER:

1 Q. Do you know how long Deb Foster worked in
2 the control room?

3 A. She -- she worked about 20 years,
4 25 years.

5 Q. 20, 25 years, okay.

6 What about Ellen Wilson?

7 A. She was there about 25 years. She just
8 switched jobs.

9 Q. And Lori Huddleston?

10 A. She is still there.

11 Q. She is still there.

12 What -- do you know how long ago she
13 started?

14 A. No.

15 Q. Okay.

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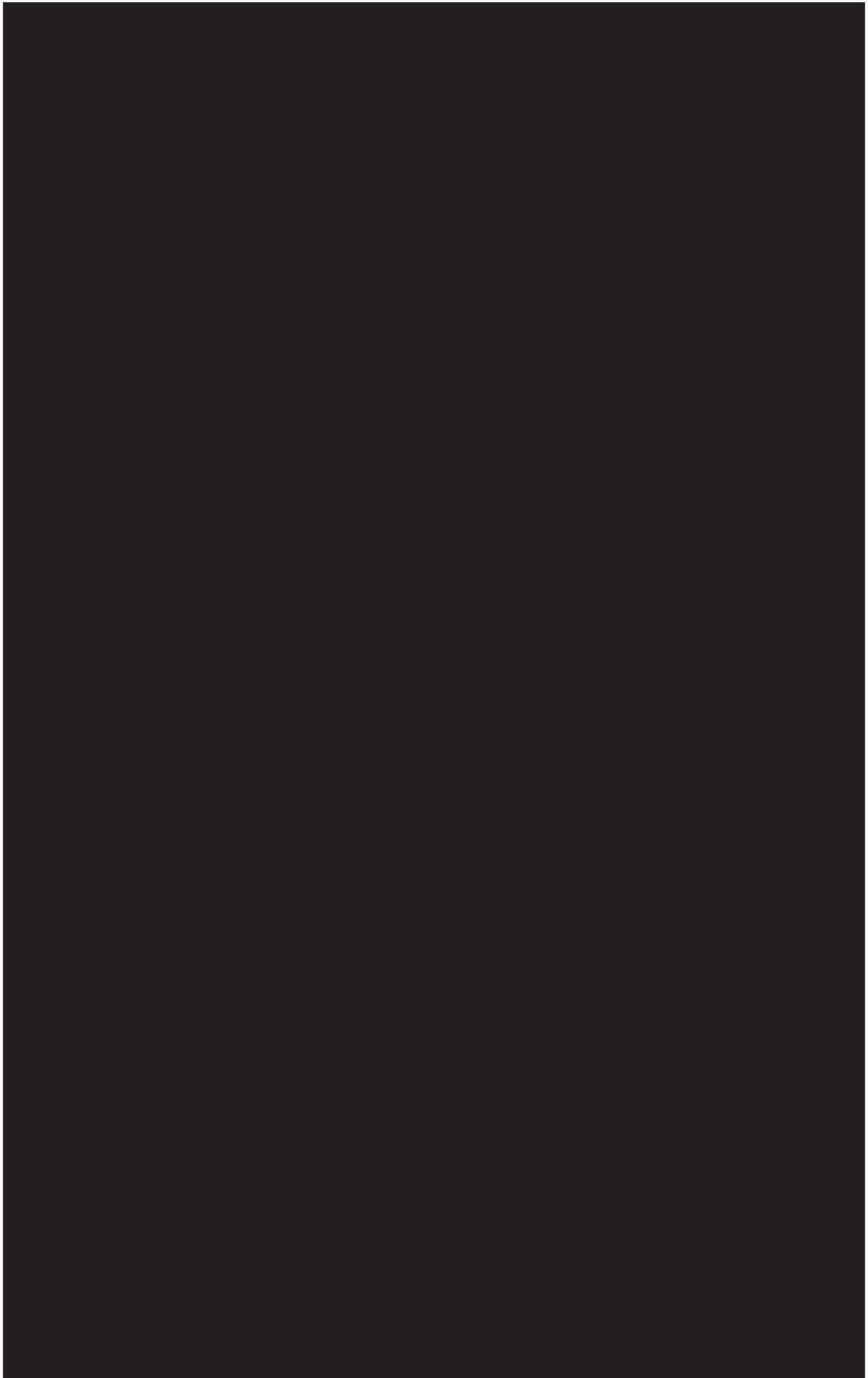
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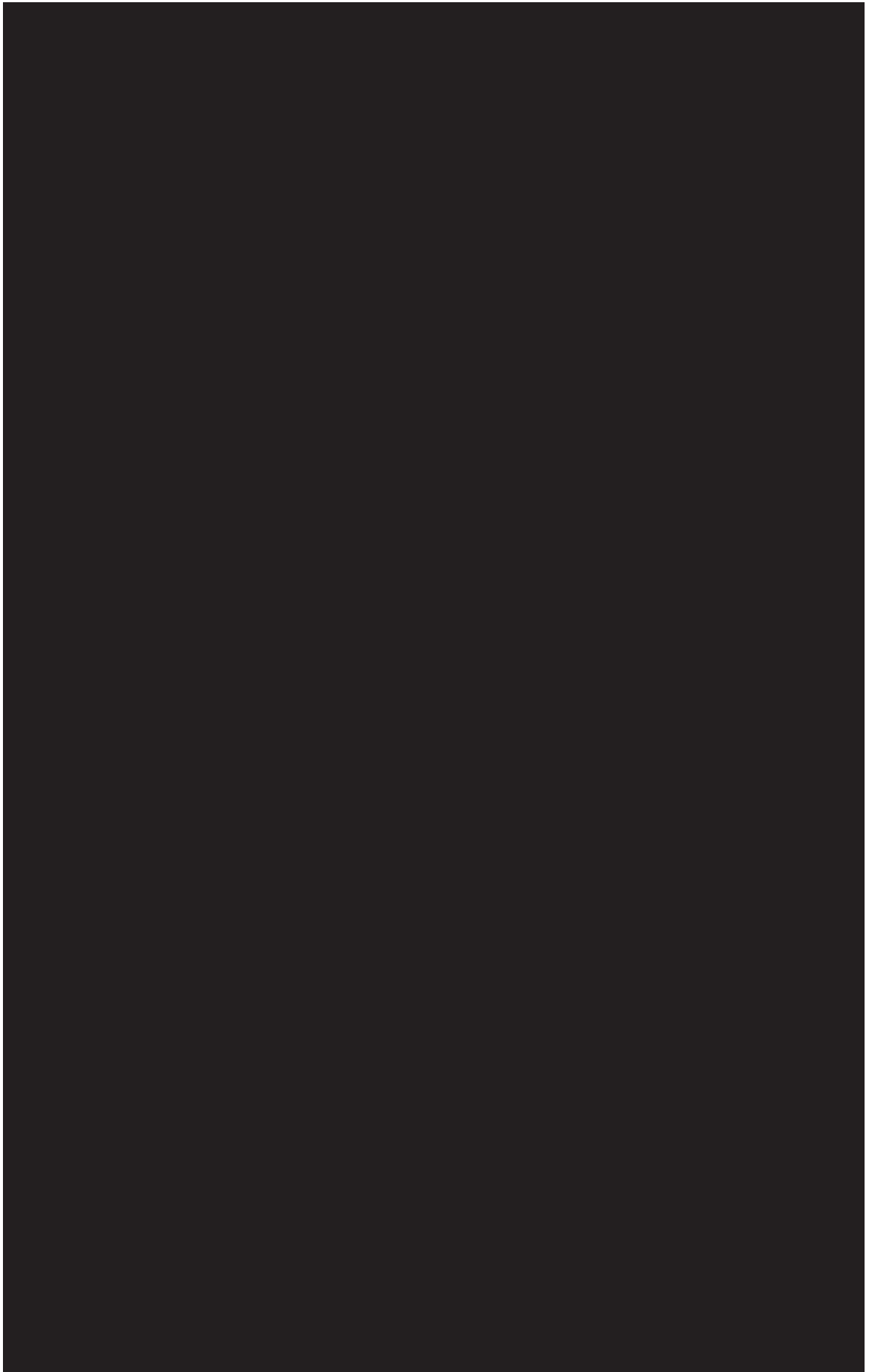
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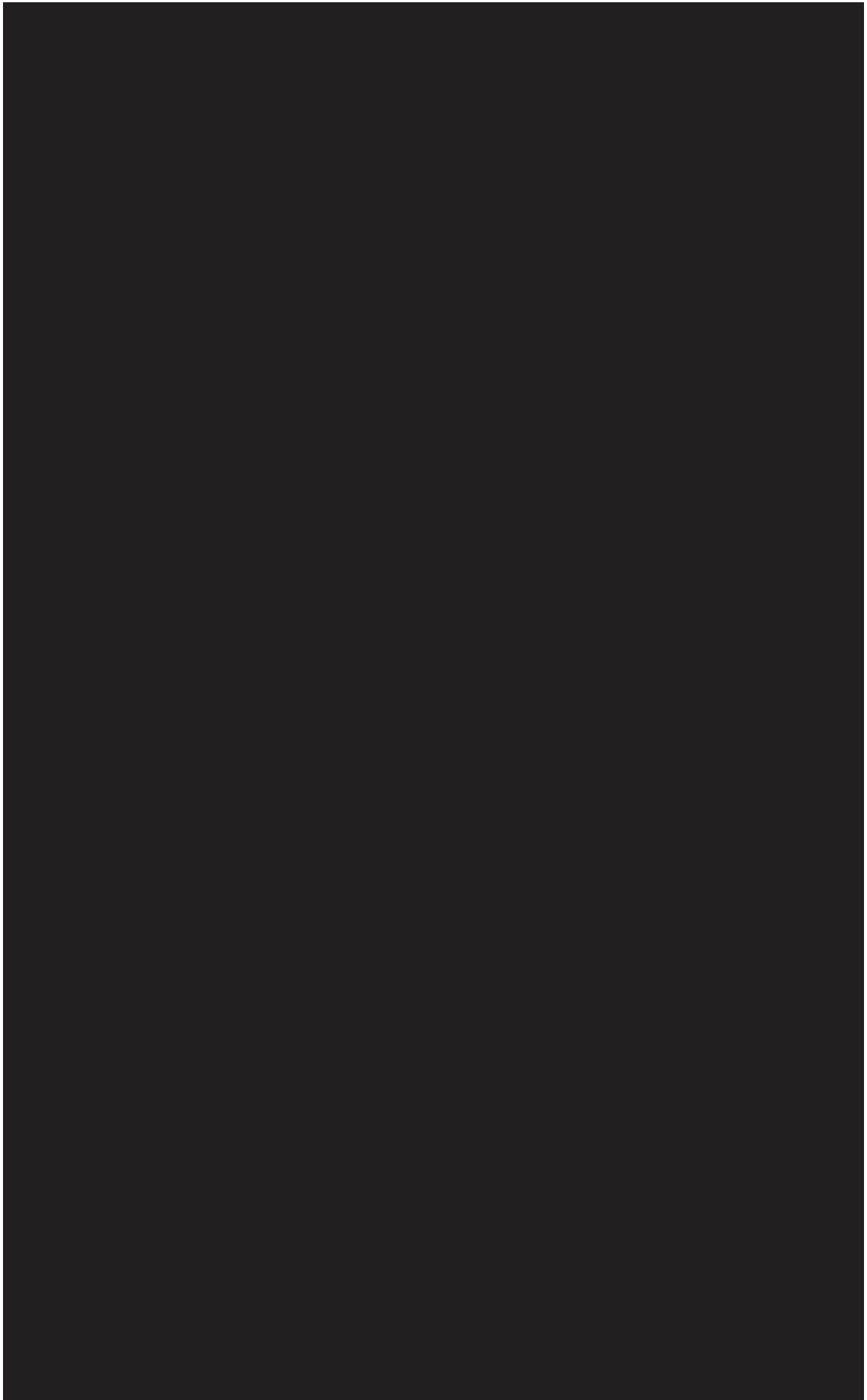
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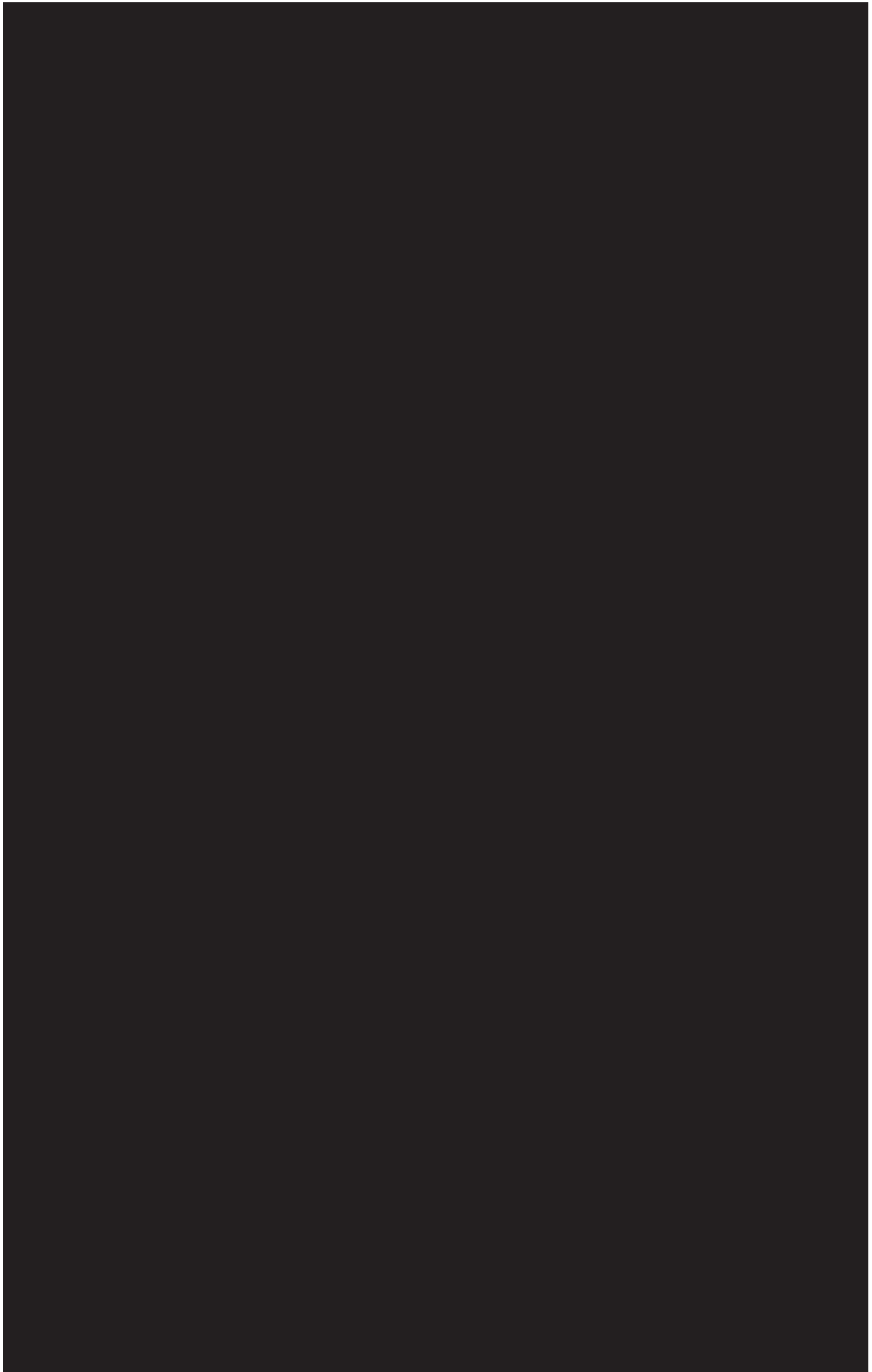
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23 I want to go back and -- and ask your best
24 estimate as to how often this would occur, you know,

1 back around 2006 to 2014.

2 Is this something that would occur, you
3 know, maybe once a quarter or once every six months or
4 is this something that would occur every day?

5 MR. HYNES: Objection to form.

6 BY THE WITNESS:

7 A. I don't remember.

8 BY MR. ELSNER:

9 Q. I know it's hard to remember everything
10 that I'm asking, but I really want you to try to do
11 your best to tell me, is this something that was a
12 routine part of your job that occurred every single
13 day?

14 MR. HYNES: Objection to form.

15 BY THE WITNESS:

16 A. Not every single day.

17 BY MR. ELSNER:

18 Q. Okay. Is it something that was routine
19 enough that it occurred once a week?

20 MR. HYNES: Objection to form.

21 BY THE WITNESS:

22 A. Not every week.

23 BY MR. ELSNER:

24 Q. Not every week.

1 Was it something that was routine enough
2 that would occur every month?

3 MR. HYNES: Objection to form.

4 BY THE WITNESS:

5 A. Not every month.

6 BY MR. ELSNER:

7 Q. Okay.

8 So this was more of a sort of out of
9 ordinary experience, is that --

10 MR. HYNES: Objection to form.

11 BY MR. ELSNER:

12 Q. -- is that accurate?

13 A. Yes.

14 Q. Okay. Do you know whether it would occur
15 once every six months?

16 MR. HYNES: Objection to form.

17 BY THE WITNESS:

18 A. Maybe.

19 BY MR. ELSNER:

20 Q. Maybe.

21 It could be -- it could be not even once
22 every six months, is that right?

23 MR. HYNES: Objection to form.

24 BY THE WITNESS:

1 A. (Nodding head.)

2 BY MR. ELSNER:

3 Q. Okay. Are you pretty confident that it
4 occurred ev- -- at least there was one every year?

5 A. Yes.

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MR. ELSNER: Let's take a quick break.

5

MR. HYNES: Sure.

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THE VIDEOGRAPHER: We are off the record at

7

10:06 a.m.

8

(WHEREUPON, a recess was had

9

from 10:06 to 10:15 a.m.)

10

THE VIDEOGRAPHER: We are back on the record at

11

10:15 a.m.

12

BY MR. ELSNER:

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MR. ELSNER: Okay. I'm going to pass the
witness at this time.

MR. HYNES: Okay. Can I just have five minutes?
I've got to check --

MR. ELSNER: Sure.

MR. HYNES: -- one thing and then I'll...

MR. ELSNER: We're going to go off the record.

THE VIDEOGRAPHER: We are off the record at
10:16 a.m.

(WHEREUPON, a recess was had
from 10:16 to 10:27 a.m.)

THE VIDEOGRAPHER: We are back on the record at
10:27 a.m.

1 MR. ELSNER: I -- I pass the witness.

2 MR. HYNES: I have no -- no questions for the
3 witness. Thank you for your time everyone.

4 MR. ELSNER: Thank you, Ms. Hinkle.

5 THE WITNESS: Thank you.

6 THE VIDEOGRAPHER: We are off the record at
7 10:27 a.m. This concludes the videotape deposition of
8 Sherri Hinkle.

9 (Time Noted: 10:27 a.m.)

10 FURTHER DEPONENT SAITH NOT.

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1 REPORTER'S CERTIFICATE

2

3 I, JULIANA F. ZAJICEK, C.S.R. No. 84-2604,
4 a Certified Shorthand Reporter, do hereby certify:

5 That previous to the commencement of the
6 examination of the witness herein, the witness was
7 duly sworn to testify the whole truth concerning the
8 matters herein;

9 That the foregoing deposition transcript
10 was reported stenographically by me, was thereafter
11 reduced to typewriting under my personal direction and
12 constitutes a true record of the testimony given and
13 the proceedings had;

14 That the said deposition was taken before
15 me at the time and place specified;

16 That I am not a relative or employee or
17 attorney or counsel, nor a relative or employee of
18 such attorney or counsel for any of the parties
19 hereto, nor interested directly or indirectly in the
20 outcome of this action.

21 IN WITNESS WHEREOF, I do hereunto set my
22 hand on this 29th day of January, 2019.

23

24 JULIANA F. ZAJICEK, Certified Reporter

1 DEPOSITION ERRATA SHEET

2

3

4 Case Caption: In Re: National Prescription

5 Opiate Litigation

6

7 DECLARATION UNDER PENALTY OF PERJURY

8

9 I declare under penalty of perjury that I
10 have read the entire transcript of my Deposition taken
11 in the captioned matter or the same has been read to
12 me, and the same is true and accurate, save and except
13 for changes and/or corrections, if any, as indicated
14 by me on the DEPOSITION ERRATA SHEET hereof, with the
15 understanding that I offer these changes as if still
16 under oath.

17

18

19


20 SUBSCRIBED AND SWORN TO

21 before me this day

22 of , A.D. 20__.

23

24 Notary Public

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